



COMDTINST 6260.1
MAR 24, 1998

COMMANDANT INSTRUCTION 6260.1

Subj: ASBESTOS, LEAD AND RADON IN COAST GUARD HOUSING

- Ref:
- (a) Asbestos Exposure Control Manual, COMDTINST M6260.16A
 - (b) Asbestos Containing Materials in Schools (40 CFR Part 763) (NOTAL)
 - (c) HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, June 1995 (NOTAL)
 - (d) National Primary Drinking Water Regulations (40 CFR 141.86) (NOTAL)
 - (e) A Citizen's Guide to Radon, 1992 (EPA Document #402-K92-001) (NOTAL)
 - (e) Safety and Environmental Health Manual, COMDTINST M5100.47

1. PURPOSE. To establish a safety and health risk assessment standard and prescribe responsibilities for the identification, evaluation, and management of asbestos, radon, and lead in Coast Guard owned housing, Child Development Centers (CDC) and Unaccompanied Personnel Housing (UPH).
2. ACTION. Area and district commanders, commanders of maintenance and logistics commands, commanding officers of headquarters units, assistant commandants for directorates, Chief Counsel, and special staff offices at Headquarters shall ensure compliance with the provisions of this Instruction.
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND. In 1995, the Commandant developed and initiated a strategy to identify and evaluate environmental health risks present in Coast Guard ashore living environments. This included the inspection and risk assessment of Coast Guard living environments to identify the location and condition of asbestos, lead and radon. The policy as set forth in this instruction provides a framework for the successful implementation of a hazard management plan by adopting current environmental laws and national consensus standards as referenced in (a) through (e).

5. SCOPE.

- a. For asbestos and lead based paint hazards, the requirements of this instruction apply to Coast Guard owned housing, CDC and UPH constructed prior to 1981. For radon, lead in water or soil hazards, the requirements apply regardless of the age of the structure.
- b. A number of states have enacted laws for asbestos, lead or radon which are more stringent than the requirements of this instruction. In those states, state law takes precedence over the requirements of this instruction.

6. REQUIREMENTS. Pre-1981 Coast Guard owned housing, CDC and UPH, shall be assessed for asbestos, lead and radon risks by accredited personnel. Risks identified at the action or major finding levels will receive appropriate corrective action. Risks identified at or above the monitoring level will receive periodic follow-up risk assessments.

7. DEFINITIONS:

- a. Action Level. That concentration or physical condition which may pose an increased human health risk. Findings at the action level require corrective action to reduce the risk to the monitoring level or below.
- b. Interim Controls. Temporary measures used to reduce health hazards to the monitoring level until permanent corrective action can be taken.
- c. Major Finding. That concentration or physical condition which presents an immediate health risk to occupants and requires immediate corrective action.
- d. Monitoring Level. That concentration or physical condition which at present does not pose a health risk to humans or require corrective action, but which must be periodically monitored to ensure that conditions do not change.
- e. Risk Assessment. For the purposes of this instruction, a risk assessment is:
 - (1) a comprehensive inspection and sampling of Coast Guard owned housing, CDC or UPH, following the inspection, sampling and analyses protocols of section 9 of this instruction, to measure the condition and/or amount of asbestos, lead or radon present; and
 - (2) a comparison of the results obtained against the standards of section 8 of this instruction to determine the level or degree of risk.
- f. Small Child. A child under the age of seven.

8. RISK ASSESSMENT STANDARDS.

Asbestos:

Monitoring Level	Action level	Major Finding
Asbestos Containing Material (ACM) which is identified in a state of good repair and has a low potential for disturbance, using ref. (b) hazard assessment guidelines.	ACM which scores fair (damage) or has moderate potential for damage, using ref. (b) hazard assessment guidelines and airborne asbestos concentrations are less than (,) 0.1 fibers per cubic centimeter (f/cc).	ACM in poor (significantly damaged) condition or has a high potential for significant damage, using ref. (b) hazard assessment guidelines or airborne asbestos concentrations are greater than (>) 0.1 f/cc.

Lead In Paint:

Monitoring Level	Action Level	Major Finding
The interior or exterior paint has a lead content greater than or equal to: (a) 1.0 milligrams per centimeter square (1.0 mg/cm ²) or (b) 0.5% by weight; and the entire surface is intact when assessed using ref. (c) guidelines.	The interior or exterior paint has a lead content greater than or equal to: (a) 1.0 mg/cm ² or (b) 0.5% by weight; and the paint surface is in fair or poor condition when assessed using ref.(c) guidelines.	The interior or exterior paint has a lead content greater than or equal to: (a) 1.0 mg/cm ² or (b) 0.5% by weight; and the paint surface is in poor condition when assessed using ref.(c) guidelines; and the paint is in an area normally occupied by a small child.

Lead In Dust:

Monitoring Level	Action Level	Major Finding
Normally occupied interior areas found to contain lead paint at or above the monitoring level and the amount of lead in dust is: Floors (carpeted and uncarpeted): Less than 100 micrograms per square foot (100 ug/ft ²). Interior Window Sills: Less than 500 ug/ft ² . Window Troughs: Less than 800 ug/ft ² .	Normally occupied interior areas found to contain lead paint at or above the monitoring level and the amount of lead in dust is: Floors (carpeted and uncarpeted): Greater than or equal to 100 ug/ft ² . Interior Window Sills: Greater than or equal to 500 ug/ft ² . Window Troughs: Greater than or equal to 800 ug/ft ² .	Action Level conditions are met and the interior area is normally occupied by a small child.

COMDTINST 6260.1
MAR 24, 1998

Lead in Soil:

Monitoring Level	Action Level	Major Finding
Bare residential soil around building perimeters and yards: 400 - 2000 ppm.	Bare residential soil around building perimeters and yards: 2000 - 5000 ppm.	Bare residential soil around building perimeters and yards: Greater than 5000 ppm.
Play areas and high-contact areas for children: 100 - 200 ppm.	Play areas and high contact areas for children: 200 - 400 ppm.	Play areas and high contact areas for children: Greater than 400 ppm.

Lead In Water:

Monitoring Level	Action Level	Major Finding
10 - 14 micrograms per liter (ug/L) or parts per billion.	15 - 50 ug/L	Greater than 50 ug/L

Radon:

Monitoring Level	Action Level	Major Finding
2-4 picocuries per liter (pCi/L) present in normally occupied interior areas.	5 - 20 pCi/L present in normally occupied interior areas	Greater than 20 pCi/L present in normally occupied interior areas.

9. INSPECTION, SAMPLING AND ANALYSIS PROTOCOLS:

- a. Asbestos. Asbestos inspection and sampling shall be conducted in accordance with (IAW) the requirements of references (a) and (b). Asbestos sample analysis will be performed by laboratories accredited by the National Institute of Standards and Technology's (NIST) National Voluntary Laboratory Accreditation Program.
- b. Lead Based Paint and Lead in Dust. Inspection and sampling shall be conducted in accordance with reference (c) guidelines. For the analysis of lead samples only National Lead Laboratory Accreditation Program (NLLAP) laboratories will be used.
- c. Lead in Soil. Soil sampling and analysis for lead shall be conducted in accordance with reference (c) guidelines.
- d. Lead in Water. Drinking water inspection, sampling, and analysis for lead shall be conducted in accordance with the requirements of reference (d).

- e. Radon. Sampling and analysis shall be conducted in accordance with reference (e) guidelines using EPA recommended testing devices.

10. CORRECTIVE ACTION:

- a. Findings at the major finding level present a high health risk to Coast Guard members and their dependents. Major findings shall receive immediate corrective action to abate the hazard. In cases where abatement, including interim or engineering controls, cannot immediately be initiated to adequately protect the Coast Guard members and their at risk dependents the family shall be removed from the high risk environment. As a minimum, the permanent correction applied shall reduce the risk to below the action level. In the case of a major finding for lead:
 - (1) In Water. Coast Guard members and their dependents may be provided bottled water as an interim control measure.
 - (2) In Residential Soil. Immediate action shall be taken to eliminate contact as an interim control measure, until the soil is permanently abated by removal or covering.
- b. A Shore Station Maintenance Request shall be initiated for action level findings requiring engineering remediation or abatement. Until the deficiency can be permanently corrected, interim controls will be initiated to reduce the risk to below the action level.
- c. Asbestos or lead action level or major finding shall be corrected by contractors licensed to perform asbestos and/or lead work and not by Coast Guard personnel, unless authorized by MLC (k). Unless prohibited by state law, contracts shall be developed using the philosophy of "manage in place" rather than rip-out and remove.

11. BLOOD LEAD SCREENING, TESTING AND FOLLOW-UP. The parents of small children residing in Coast Guard owned housing or using a CDC which has a lead hazard meeting action level or major finding conditions, shall be encouraged to have a blood lead screening test performed on the child; testing will be arranged for and costs will be borne by Coast Guard. Small children who test at or above the Center for Disease Control and Prevention recommended the maximum of 10 micrograms per deciliter (10 ug/dL) for lead shall be removed from the identified source of exposure if immediate controls measures cannot be instituted. An Elevated Blood Level (EBL) investigation will be initiated on the children, following reference (c) guidelines and the children shall be monitored every six months until below maximum.

12. FOLLOW-UP RISK ASSESSMENTS:

- a. Follow-up risk assessments are required when initial or baseline risk assessments have revealed the presence of asbestos, lead or radon hazards at or above the monitoring level in Coast Guard owned housing, CDC or UPH. MLC (k) shall maintain a system to ensure that follow-up risk assessments are performed periodically in such housing to determine the effectiveness of interim controls and to identify emerging hazards above the monitoring level. Follow-up risk assessments may be conducted in conjunction with routine unit inspections, audits, or visits.
- b. Each follow-up risk assessment shall be documented by a written report containing findings and recommendations. Copies of reports shall be provided to MLC (s) and the cognizant Civil Engineering Unit (CEU).

13. TRAINING AND ACCREDITATION. All personnel engaged in asbestos and lead inspection, sampling, and risk assessment shall either:

- a. Be certified in the comprehensive practice of Industrial Hygiene by the American Board of Industrial Hygiene or
- b. Successfully complete an Asbestos AHERA Inspector/Management Planner and/or Lead Based Paint Inspector/Risk Assessor EPA approved training course.

14. RESPONSIBILITIES:

- a. Commander, maintenance and logistics commands (k) shall:
 - (1) Insure that an appropriate number of MLC (k) staff members are trained and accredited in accordance with the requirements of this instruction.
 - (2) Conduct initial or baseline risk assessments of housing, CDC and UPH, within the scope of this instruction which have not been previously inspected and sampled or are not scheduled for contract inspection and sampling. These baseline risk assessments may be conducted during routine unit inspections, audits or visits. Each baseline risk assessment shall be documented by a written report containing findings and recommendations. Copies of written reports shall be provided to MLC (s) and the cognizant CEU.
 - (3) Categorize previously inspected and sampled Coast Guard owned housing, CDC and UPH, using the risk assessment standards given in section 8 of this instruction.
 - (4) Conduct follow-up risk assessments of previously inspected Coast Guard owned housing, CDC and UPH. See section 12 of this instruction.

- (5) Ensure that asbestos, lead or radon concentrations or physical conditions identified at the action or major finding level are entered into the reference (f) Safety and Health Hazard Abatement Data System and are tracked until corrected.
 - (6) Work with parents and coordinate with unit or group HS technicians to ensure that small children living in Coast Guard owned housing or a CDC which has lead meeting the conditions of an action level or major finding are provided the opportunity to participate in blood lead testing and follow-up. As appropriate initiate and conduct EBL investigations.
- b. Commander, maintenance and logistics commands (s) and commanding officers, CEU's shall:
- (1) Ensure that major finding conditions which have been identified at Coast Guard owned housing, CDC or UPH, are corrected on a health hazard priority basis.
 - (2) Ensure that action level conditions which have been identified at Coast Guard owned housing, CDC or UPH, are assigned the appropriate priority and funding source for correction.
 - (3) Ensure the proper waste disposal of all hazardous materials resulting from these remediations.
- c. Area housing authorities shall:
- (1) Coordinate with MLC (s) and the CEU's to ensure that if major findings at Coast Guard owned housing or UPH cannot receive immediate corrective action, the Coast Guard members and their at risk dependents are removed to temporary quarters until the risk can be abated.
 - (2) Work with group commanders, unit commanding officers and unit housing coordinators to ensure that residents of Coast Guard owned housing, and UPH as well as CDC staffs are aware of:
 - (a) the potential hazards of lead, asbestos and radon, and
 - (b) the measures they can take, as well as measures being taken by Coast Guard, to remove these hazards.

d. Units.

- (1) Units Attached to a Group. Group commanders shall determine if units within the group have Coast Guard housing, CDC or UPH, meeting the scope of this instruction.
- (2) Other Units. Commanding officers shall determine if their unit has Coast Guard owned housing, CDC or UPH, meeting the scope of this instruction.
- (3) Group commanders or commanding officers shall:
 - (a) Ensure that residents of unit housing, CDC and UPH, are kept informed of efforts to identify, assess and correct any asbestos, lead or radon hazards found.
 - (b) Work with the MLC's and CEU's to ensure that unit housing which has been identified as meeting major finding or action level conditions are assigned the proper priority for correction and, where appropriate, are included on the unit's engineering backlog.

/s/ JOYCE M. JOHNSON
Director of Health and Safety